Government Purchase Card (GPC) Up To $25,000

Cardholder/Approving Official Training

Introduction

This presentation does not replace the basic Government Credit Card training but supplements it. This briefing is required for cardholders/billing official who will receive authority to make purchases over $3,000_

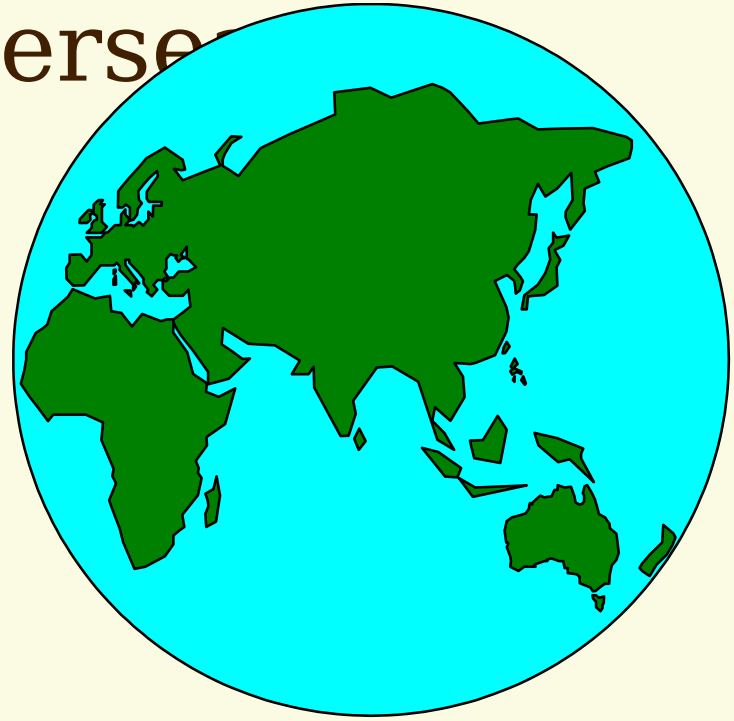
CURRENT GPC USES

- To procure supplies and services valued up to $3,000

- Minor construction or repairs up to $2,000

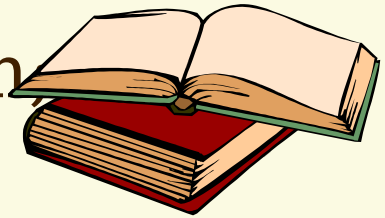
NEW EXPANSION

- A stand-alone basis up to $25K for overse



DFARS 213.301
Simplified Acquisition Procedures

- An Individual with proper delegations may use the GPC to make purchases that exceeds the micro-purchase threshold up to $25,000 if the purchase:
  - Is made outside the United States for use outside the United States
  - Is for a commercial item



DFARS 213.301 Simplified Acquisition Procedures

- Is not for work to be performed by employees recruited within the United States;

- Is not for supplies or services originating from, or transported from or through Cuba, Iran, Iraq, Libya, North Korea or Sudan;

- Is not for ball or roller bearings as end items;

-Does not require access to classified or Privacy Act information;

-Does not require transportation of

GPC USE UP TO $25K

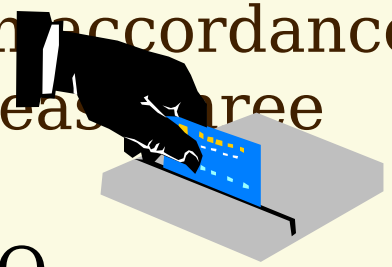
DFARS 213.301
Simplified Acquisition Procedures

The individual making the purchase:

– Is authorized and trained in accordance with agency procedures

– Complies with FAR 8.001 (Mandatory Sources) when making the purchase

– Seeks maximum practicable competition for the purchase in accordance with FAR 13.104(b) (solicit at least three sources)



GPC USE UP TO $25K

DFARS 213.301 Simplified Acquisition Procedures

- Commercial item procurement
  - A commercial item is any item other than real property, that is of a type customarily used for non-governmental purposes and that -
    - has been sold, leased or licensed to the general public; or
    - has been offered for sale, lease or license to the general public
- Construction and repair is not considered as a Commercial Item.

DFARS 213.301 Simplified Acquisition Procedures

- The procuring of commercial services will be coordinated with each servicing RCO.
  - The DFARS term includes:
    - Installation services
    - Maintenance services
    - Repair of equipment services
    - Training services

- ✔ As long as services are procured in support of a commercial item

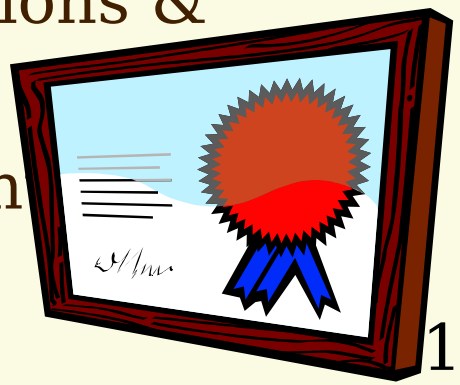
GPC USE UP TO $25K

DFARS 213.301 Simplified Acquisition Procedures

- Purchase of Services is not recommended by Regional Contracting Office Benelux:
  - Difficult to get a Firm Fixed Price
  - No contractual binding statement of work
  - Disputes subject to standard commercial practices

$25K IMPLEMENTATION

- Appointment letter for Delegation of purchase authority IAW DFARS 213.301
  - Issued by chief of servicing RCO to cardholder by name
    - Contains authority, limitations & requirements
    - Requires acknowledgemen



TRAINING REQUIREMENTS

- ✔ Law, Regulations, Policies, Procedures
- ✔ Required Source of Supply and Service
- ✔ Simplified Acquisition Procedures
- ✔ File Documentation Requireme
- ✔ Maximum practicable Competiti

GPC USE UP TO $25K

Required Source of Supply and Service

- IAW FAR Part 8.001, agencies shall satisfy requirements for supplies and services from or through priority sources prior to purchasing on the open market

Javits-Wagner-O'Day Act

- Referred to as "the JWOD Act"
- Named for its enabling legislation, the Javits-Wagner -O'Day Act of 1971
- 41 U.S.C.46-48c
- FAR Subpart 8.7

JWOD - A Required Source of Supplies and Services

- The JWOD Act requires Federal Agencies to purchase products manufactured by nonprofit participating agencies, the National Industries for the Blind (NIB) and National Industries for the Severely Handicapped (NISH).

JWOD Program

- Use of the GPC OCONUS up to $25K, require Cardholders to comply with the JWOD Act.
- Compliance with JWOD can be accomplished by purchasing items of supplies and services identified by the SKILCRAFT trademark.

WWW.JWOD.com

- Non-availability from JWOD on-line must be determined prior to purchase of a product from any other source.
- Determine if a product is available from JWOD by accessing JWOD on-line at **www.jwod.com.**
- Print out non-availability as file documentation.

JWOD Sources of Supply

- On-line ordering with www.JWOD.com
- GSA Advantage
- GSA Federal Supply Schedule
- Here in OCONUS, the local Army/Air Force Exchange Service is the only commercial source of JWOD products

Federal Supply Schedule (FSS) Program

- Directed and Managed by GSA
- www.fss.gsa.gov
- A simplified process for purchasing commercial supplies and services at prices associated with volume buying.
- Must compete between GSA FSS

MAXIMIZING COMPETITION

ON OPEN MARKET NON-GSA BUYS EXCEEDING $2,500

- The FAR requires Full and Open Competition when acquiring supplies and services
  - Orally solicit at least three sources to promote competition to maximum extent
    - When possible, solicit two s
      solicited on previous purch

GPC USE UP TO $25K

MAXIMIZING COMPETITION

ON OPEN MARKET NON-GSA BUYS EXCEEDING $2,500

- ✔ Sole Sources are permitted in cases of:
  - Urgency
  - Impossible to acquire from another source

GPC USE UP TO $25K

Sole Source Purchases

- Sole Sources must be approved by a RCOB Contracting officer prior to purchases being made. This will be accomplished by memorandum. After reviewing the memo, the contracting officer will certify that the justification is accurate and complete and return to the cardholder prior to purchase.

Sole Source Purchases

- The text of the memo must include:
  - A brief non-technical description of the supplies/services to be acquired
  - A clear and concise statement regarding the circumstances justifying the sole source
  - A statement that the proposed sole source is the only known source that can satisfy the requirement
  - A statement explaining how future sole source acquisition for the same or similar requirements will be avoided.

DOCUMENTING PRICE REASONABLENESS

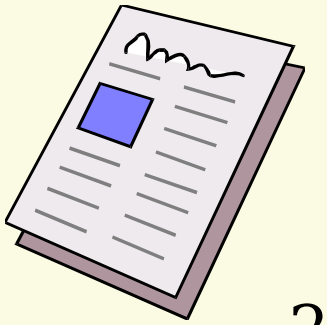
FOR OPEN MARKET PURCHASES (NON-GSA)

- Before award, the cardholder shall determine and document that the proposed price is fair and reasonable:
  - Base price reasonableness on competitive quotes
  - If only one response is received, include a statement of price reasonableness in purchase file, the statement may be based on:
    - Market research
    - Comparison of proposed price with price found reasonable on previous purchases

DOCUMENTING PRICE REASONABLENESS CONT'D

- Current price lists, catalogs, or advertisements
- Comparison with similar items in a related industry
- Your personal knowledge of the item being purchased
- Any other reasonable basis

✔ Complete the "GPC Cardholder's Determination of Price Reasonableness" Form for each purchase made.

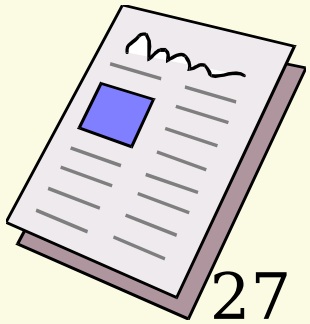


FILE DOCUMENTATION & REPORTING REQUIREMENTS

- Reporting requirements
  - General rule
    - DFARS 204.6 requires all contract actions of $25,000 or less be reported on DD Form 350
    - Important exception: GPC purchases under $3,000 are reported to DOD by US Bank, not by reporting on DD Form 350
    - **GPC actions between $3,000 and $25,000 must be reported on DD Form 350**

FILE DOCUMENTATION & REPORTING REQUIREMENTS

- Reporting requirements (continued)
  - DD Form 350 will be completed as follows:
    - Actions $3,000.01 to $10,000
    - Actions $10,000.01 to $25,000
  - Cut off monthly actions on 30th of month
  - Submit completed DD Form 350 to RCO within 5 days after cutoff



REPORTING REQUIREMENTS
DD 350

DD350

MONTH :

Number of actions **Amount in $**

From 3,000.01 to $10,000

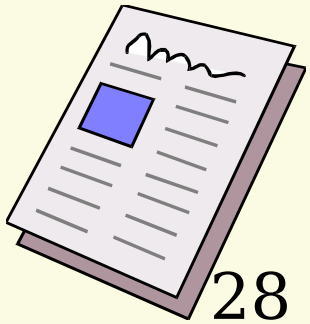
COMPETITIVE
NON-COMPETITIVE:

From $10,000.01 to $25,000

COMPETITIVE:

NON-COMPETITIVE: _____ _____

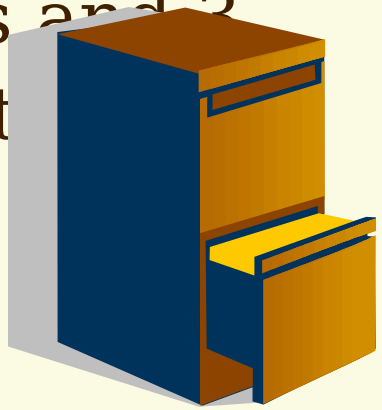
TOTAL



GPC USE UP TO $25K

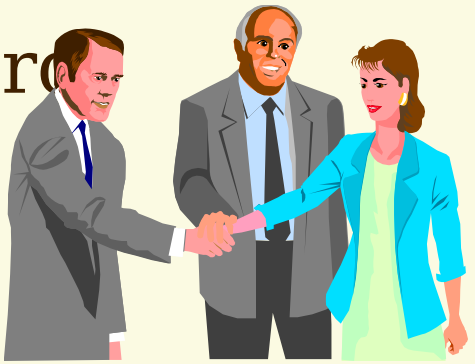
FILE DOCUMENTATION & REPORTING REQUIREMENTS

- Complete the “ABSTRACT OF OFFERS” with names/phone numbers of sources contacted
- File retention - maintain documentation for 6 years and 3 months after purchase dat



STANDARD OF CONDUCT

- STANDARD OF CONDUCT
  - GPC cardholders(U.S.) must comply with DOD 5500.7-r
  - Acknowledgement of receipt of appointment letter constitutes willingness to comply with standard of conduct

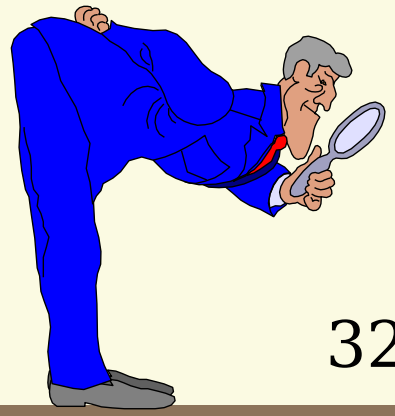


PROPERTY ACCOUNTABILITY

- Property Accountability
  - All non-expendable personal property items and all durable items purchased by IMPAC must be reported to the appropriate accountable officer for inclusion in government property books
  - Contact property book officer (PBO) to determine whether item is accountable property

OVERSIGHT

- Oversight
  - Level IV APC will:
    - Conduct surveillance of 100% of cardholder transactions between $3,000 - $25,000 at a minimum on semi-annual basis (every 6 months)



SUMMARY OF KEY POINTS

- The purchase must be made for use OCONUS by OCONUS cardholder.
- Purchases between $3,000 - $25,000 require competition IAW FAR 13.104 and 13.106 when purchases are not made from Mandatory Sources

SUMMARY OF KEY POINTS CONT'D

- Cardholders must document purchases using provided forms
- Cardholders must report purchases monthly to RCO APC
- APCs will conduct 100% surveillance of purchases